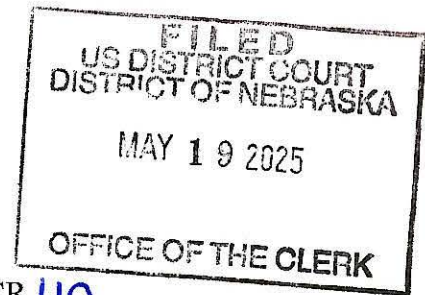


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA



UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE DAVID ALVAREZ-JIMENEZ,
YOHALEX GARCIA-VALLADARES,
ALEXANDER JOSE MAYORA-BLANCO,
and JOHAN RODRIGUEZ-HERNANDEZ,

Defendants.

8:25CR 110

INDICTMENT

18 U.S.C. § 371
18 U.S.C. § 2113(a) and 18 U.S.C. § 2
18 U.S.C. § 1030(a)(4), (b), & (c)(3)(A)

The Grand Jury charges that:

COUNT I

CONSPIRACY TO COMMIT BANK BURGLARY

From on or about January 1, 2025, and continuing through on or about February 11, 2025, in the District of Nebraska and elsewhere, the defendants, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit acts and offenses against the laws of the United States, namely to enter or attempt to enter a building used in whole or in part as a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny, in violation of Title 18, United States Code, Section 2113(a), and took an overt act in furtherance of the conspiracy.

Overt Acts

In furtherance of the conspiracy and to effect its objects, at least one of the conspirators committed at least one of the following acts:

1. On or about February 8, 2025, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, traveled to the McCook National Bank in Burlington, Colorado, wherein they opened the Automated Teller Machine (hereinafter "ATM") on the bank premises and gained access to the ATM's hard drive in order to install malware or install a different hard drive carrying malware to carry out a jackpotting scheme. A jackpotting scheme is a type of cyberattack where criminals exploit vulnerabilities in ATMs to force them to dispense cash without debiting an account.
2. From on or about February 9, 2025, and continuing through on or about February 10, 2025, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, traveled to the Adams County Bank located in Kenesaw, Nebraska wherein they opened the ATM on the bank premises and attempted to gain access to the ATM's hard drive in order to install malware or install a different hard drive carrying malware to carry out a jackpotting scheme.
3. From on or about February 9, 2025, and continuing through on or about February 10, 2025, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, traveled to the Adams County Bank in Juniata, Nebraska wherein they opened the ATM on the bank premises and gained access to the ATM's hard

drive in order to install malware or install a different hard drive carrying malware to carry out a jackpotting scheme. JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, obtained approximately \$23,000 from this jackpotting.

All in violation of Title 18, United States Code, Section 371.

COUNT II

ATTEMPTED BANK BURGLARY

From on or about February 9, 2025, and continuing through on or about February 10, 2025, in the District of Nebraska, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used in whole or in part as the Adams County Bank in Kenesaw, Nebraska, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT III

ATTEMPTED BANK BURGLARY

From on or about February 9, 2025, and continuing through on or about February 10, 2025, in the District of Nebraska, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used in whole or in part as the Adams County Bank in Juniata,

Nebraska, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT IV

CONSPIRACY TO ACCESS A PROTECTED COMPUTER

From on or about January 1, 2025, and continuing through on or about February 10, 2025, in the District of Nebraska and elsewhere, the defendants, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, conspired to knowingly and with intent to defraud accessed a protected computer without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Sections 1030(a)(4), (b) & (c)(3)(A).

COUNT V

ATTEMPTED ACCESS A PROTECTED COMPUTER

From on or about February 9, 2025, and continuing through on or about February 10, 2025, in the District of Nebraska, the defendants, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, knowingly and with intent to defraud accessed and attempted to access a protected computer, to wit: the computer system contained within the ATM at the Adams County Bank in Kenesaw, Nebraska, without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Sections 1030(a)(4), (b) & (c)(3)(A) and 2.

COUNT VI

ATTEMPTED ACCESS A PROTECTED COMPUTER


From on or about February 9, 2025, and continuing through on or about February 10, 2025, in the District of Nebraska, the defendants, JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and other individuals known and unknown to the Grand Jury, knowingly and with intent to defraud accessed and attempted to access a protected computer, to wit: the computer system contained within the ATM at the Adams County Bank in Juniata, Nebraska, without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Sections 1030(a)(4), (b) & (c)(3)(A) and 2.

A TRUE BILL.


FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


SEAN P. LYNCH, #25875
Assistant U.S. Attorney